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-and-

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Edward A. Smith (ES-2461)

Counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:

ENRON CREDITORS RECOVERY CORP.,  
*et al.*,

### Reorganized Debtors.

ENRON CREDITORS RECOVERY CORP.,

Appellant,

V.

INTERNATIONAL FINANCE CORP., *et al.*,

### Appellees.

X  
No. 01-16034 (AJC)

Chapter 11

Case No. 07 Civ. 06597 (AKH)

•  
x

**NOTICE OF MOTION FOR *PRO HAC VICE*  
ADMISSION OF DANIEL J. BUSSEL**

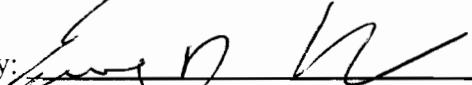
PLEASE TAKE NOTICE THAT upon the annexed declarations of Edward A. Smith dated August 20, 2007 and Daniel J. Bussel dated August 16, 2007, appellant Enron

Creditors Recovery Corp. f/k/a Enron Corp. will move this Court, before the Honorable Alvin K. Hellerstein, United States District Judge, in Courtroom 14D, United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, at a date and time to be determined, pursuant to Local Rule 1.3 of the United States District Court for the Southern District of New York, for an order admitting Daniel J. Bussel *pro hac vice* as counsel to represent Enron Creditors Recovery Corp. f/k/a Enron Corp. in this appeal and in all related matters.

Dated: New York, New York  
August 20, 2007

Respectfully submitted,

VENABLE LLP

By:   
Edward A. Smith (ES-2461)  
The Chrysler Building  
405 Lexington Avenue, 56<sup>th</sup> Floor  
New York, New York 10176  
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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ln re:

ENRON CREDITORS RECOVERY CORP.,  
*et al.*,

## Reorganized Debtors.

ENRON CREDITORS RECOVERY CORP.,

Appellant,

V.

INTERNATIONAL FINANCE CORP., *et al.*,

### Appellees.

**DECLARATION OF EDWARD A. SMITH IN SUPPORT OF MOTION  
TO ADMIT DANIEL J. BUSSEL TO PRACTICE *PRO HAC VICE***

Pursuant to 28 U.S.C. § 1746, Edward A. Smith, declares as follows:

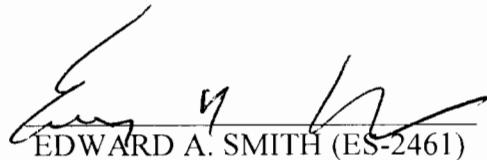
1. I am an attorney admitted to practice before this Court and am a partner at Venable LLP, counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp. ("Enron"). I submit this declaration in support of Enron's motion seeking to admit Daniel J. Bussel *pro hac vice* as counsel to represent Enron in this appeal and in all related matters.

2. Mr. Bussel is a partner at the firm Klee, Tuchin, Bogdanoff & Stern LLP, 1999 Avenue of the Stars, 39<sup>th</sup> floor, Los Angeles, California 90067 and a Professor of Law at the University of California, Los Angeles School of Law. Upon information and belief, Mr. Bussel is and has been a member in good standing of the bar of the State of California and has no pending disciplinary proceedings against him in any state or federal court.

3. Mr. Bussel agrees to pay the fee of \$25.00 upon entry of an order admitting him to practice *pro hac vice* in this case. Mr. Bussel's telephone number is (301) 407-4015 and his e-mail address is [dbussel@ktbslaw.com](mailto:dbussel@ktbslaw.com).

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: New York, New York  
August 20, 2007



EDWARD A. SMITH (ES-2461)

KLEE, TUCHIN, BOGDANOFF & STERN LLP  
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Los Angeles, California 90067  
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Edward A. Smith (ES-2461)

Counsel for Enron Creditors Recovery Corp. f/k/a Enron Corp.

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

ENRON CREDITORS RECOVERY CORP.,  
*et al.*,

Reorganized Debtors.

ENRON CREDITORS RECOVERY CORP.,

Appellant,

v.

INTERNATIONAL FINANCE CORP., *et al.*,

Appellees.

x : No. 01-16034 (AJG)

: Chapter 11

x : Case No. 07-Civ.-06597 (AKH)

x

**DECLARATION OF DANIEL J. BUSSEL  
IN SUPPORT OF MOTION FOR PRO HAC VICE ADMISSION**

Pursuant to 28 U.S.C. § 1746, Daniel J. Bussel declares as follows:

1. I submit this declaration in support of the motion to admit me *pro hac vice* before the United States District Court for the Southern District of New York to represent Enron Creditors Recovery Corp. f/k/a Enron Corp. ("Enron") in this appeal and in all related matters.

2. Attached as Exhibit A is a true and correct copy of a certificate of good standing issued by the bar of the State of California.

3. I am partner at the firm Klee, Tuchin, Bogdanoff & Stern LLP, 1999 Avenue of the Stars, 39<sup>th</sup> floor, Los Angeles, California 90067 and a Professor of Law at the University of California, Los Angeles School of Law. I am and have been a member in good standing of the bar of the State of California. There are no pending disciplinary proceedings against me in any state or federal court.

4. I agree to pay the fee of \$25.00 upon entry of an order admitting me to practice *pro hac vice* in this case. My telephone number is (301) 407-4015 and my e-mail address is dbussel@ktbslaw.com.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: Los Angeles, California  
August 16, 2007

  
\_\_\_\_\_  
DANIEL J. BUSSEL

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

ENRON CREDITORS RECOVERY CORP.,  
*et al.*,

Reorganized Debtors.

ENRON CREDITORS RECOVERY CORP.,

Appellant,

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x	:	No. 01-16034 (AJG)
:	:	Chapter 11
:	:	
:	:	
x	:	
:	:	Case No. 07-Civ.-06597 (AKH)
:	:	
:	:	
x	:	

**ORDER GRANTING MOTION FOR  
PRO HAC VICE ADMISSION OF DANIEL J. BUSSEL**

This matter having come before the Court on the motion for an order permitting Daniel J. Bussel, a partner at the firm Klee, Tuchin, Bogdanoff & Stern LLP and Professor of Law at the University of California, Los Angeles School of Law, to practice *pro hac vice* before the United States District Court for the Southern District of New York (the "Motion") to represent Enron Creditors Recovery Corp. f/k/a Enron Corp. ("Enron") in this appeal and in all related matters:

IT IS HEREBY ORDERED that the Motion is hereby granted, and Daniel J. Bussel is hereby admitted *pro hac vice* before this Court to represent Enron in this appeal and in all related matters.

Dated: New York, New York  
August \_\_\_, 2007

UNITED STATES DISTRICT JUDGE



THE  
STATE BAR  
OF CALIFORNIA

180 HOWARD STREET  
SAN FRANCISCO, CALIFORNIA 94105-1639  
TELEPHONE (415) 538-2000

August 9, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, DANIEL JAY BUSSEL, #121939 was admitted to the practice of law in this state by the Supreme Court of California on December 11, 1985; that the public record states that information has been provided pursuant to Business and Professions Code section 6086.1(c); that from the date of admission to September 27, 1999, he was an ACTIVE member of the State Bar of California; that on September 27, 1999, he was suspended from the practice of law in California by order of the Supreme Court for nonpayment of State Bar membership fees; that said suspension remained in effect to November 1, 1999 upon which last mentioned date he was reinstated by the Supreme Court upon payment of all delinquent State Bar fees and penalties; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

*Kath Lambert*  
Kath Lambert  
Custodian of Membership Records

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on August 20, 2007 I caused the foregoing Notice of Motion for *Pro Hac Vice* Admission of Daniel J. Bussel and the accompanying declarations of Edward A. Smith and Daniel J. Bussel to be sent by first-class mail the following:

Stephen J. Shimshak, Esq.  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019-6064

Douglas R. Davis, Esq.  
Paul, Weiss, Rifkind, Wharton & Garrison LLP  
1285 Avenue of the Americas  
New York, New York 10019-6064



EDWARD A. SMITH (ES-2461)